

Data Submitted (UTC 11): 4/9/2014 12:00:00 AM

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Title:

Comments: Re: Draft Supplemental EIS -Invasive plant control

April 20014

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On behalf of Carson Forest with the following are comments on the draft supplemental EIS for invasive plant control on the Carson and Santa Fe National Forests.

1)We appreciate the effort to control invasive plant species on our National Forest lands and have seen this problem worsen recently because of Drought and climate change.

However-

2)We remain concerned that the DEIS and the previous one that was appealed in 2005 failed to completely analyze the effects of pesticide use. Your species of concern, Including pollinators (bats, bees, butterflies, etc.) and Amphibians (frogs, toads, lizards, etc.)

3)All the above species are in severe decline both locally and worldwide. The current drought and climate change (warming, increased storms, increased erosion etc.) only further threaten populations and habitat of these species.

Yet The DEIS fails to acknowledge these species, their declines and how

4)With the exception of the Jemez salamander we did not see any discussion of the impact of herbicide use on the vital pollinator species-or upon other frogs, toads and lands,

5)Because of threats to pollinators world-wide especially 1) colony collapse disorder in bees. 2) White nose syndrome in bats. 3) Chytrid fungus in frogs. These species are threatened with extinction and herbicide use puts them at further risk. Because bees, butterflies and bats rely upon plants for host sites, pollen, and nectar. Plants like these and the invasive (olive, salt cedar) provide housing for these species. So treatments using herbicides on such invasiveness has the potential to harm any bees, bats butterflies, moths and other species. The DEIS supplement failed to address their concern or even analyze it.

6)The airborne species are critical for ecosystem health and pollination. Herbicide use threatens their viability especially with cumulative impacts of airborne diseases, habitat loss and climate change.

7)While some species are listed (p.78, 80, exc.) under the affects table s-41, There is no discussion regarding risk to these animals, ie. Spotted bat lives in caves and no treatments would occur in caves- so it was determined there would be no effect on bats from any treatments. If these plants are sprayed with herbicides how would this effect bats and their reproductions etc.?

8)The same concern is for bees, no mention. Also butterflies and moths they visit hundreds of plants both native and non-native (invasive and non-invasive included). Herbicide use would negatively affect (A likely kill) such species, yet no analysis

9)Also bird species often dig truffles, burry pinecones, etc. In addition to eating thousands of small insects (ants, spiders, etc.). What about herbicide treatments upon humming birds, songbirds especially blue birds and flycatchers that visit invasive plants to clean insects? If such plants are sprayed with a toxic herbicide, how will this affect these birds?

10) Also of concern are birds of prey such as the Mexican spotted owl, goshawk, bared owl and other species. Many birds' burry pinecones dig truffles and get insects from soil under plants. If invasive are treated with

herbicide, how will it affect birds or nomads that dig under these plants? There is no way to keep wildlife away from sprayed areas especially birds and insects as well as small nomads. So even if they may not be directly affected by an herbicide treatment, they are likely to be indirectly affected by toxic sprays.

11) For species in decline and sensitive species of concern, any further toxic risk to their population is unacceptable.

12) This includes some plant species even with migration measures. The loss of one plant is important and the use of herbicides puts these plants at further risk (Rocky mtns. Jemez mtns.)

13) We recommend larger facilities near riparian areas. Wind, soil movements, rain, snowfall all wash herbicides a good distance from where they are sprayed. Any treatments need to be much farther from all riparian areas and springs / wet meadows.

14) Finally while we continue to support using no herbicides, we remain concerned regarding the failure to address herbicide impacts adequately upon species of concern.

15) The DEIS supplement acknowledges that the EPA has incomplete data for many chemicals and the additive effects of toxic chemicals, toxicity of inert ingredients, chronic exposure, by-products and the health effects to sensitive populations all result in some health risk. (p.172) (p.206) etc.

16) Because of the failure of the EPA (and the toxic substance control act to regulate herbicides adequately) and the sheer consequences regarding many chemicals and their risks, the use of herbicides on our public lands is a violation of the law.

17) Concern over round-up and its use on GMO crops has shown that this herbicide has had a significant effect upon Monarch butterflies in the mid-western U.S. Round-up use has resulted in decline of native plants that the monarchs depend upon (milkweed) and while the situation on our National Forest is different. This is a clear example of how an herbicide can indirectly influence and cumulatively influence the decline of one species.

18) We believe that herbicide use is inappropriate on our National Forests. And it puts wildlife and the public at an unacceptable risk.

19) The DEIS supplement failed to analyze adequate risks to pollinators and also of the cumulative impact of drought, climate changes and pollinator declines combined with herbicide uses. Please address these concerns in the FEIS.

Thank you,

Sincerely Joanie Berde for Carson Forest watch.